

# EXHIBIT C

**Jennifer Daddio**

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**From:** Robert Grand  
**Sent:** Monday, February 11, 2008 10:59 AM  
**To:** 'john@bozlaw.com'  
**Cc:** 'Robert C. Carrillo'; Jennifer Daddio; Mary Grieco; crystal.scott@bozlaw.com; Ira S. Sacks  
**Subject:** RE: GMA v. Eminent

John,

As a follow up to my last email, your office has still not told me if you wish to proceed with Mr. Tierney's deposition this week, or if you intend to proceed with the deposition of a witness from Lisa Kline on February 20. Please advise.

**Robert J. Grand**  
Partner

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-----Original Message-----

**From:** John P. Bostany [mailto:john@bozlaw.com]  
**Sent:** Friday, February 08, 2008 8:59 PM  
**To:** Robert Grand  
**Cc:** 'Robert C. Carrillo'; Jennifer Daddio; Mary Grieco; crystal.scott@bozlaw.com; Ira S. Sacks  
**Subject:** RE: GMA v. Eminent

Mr. Grand

Judge Freeman ordered us to meet and confer and went thru some general guidelines that apply in document production. She did not rule on your application which she found to be premature since it was not preceded by a meet and confer which she directed you to have with me. She did not require us to provide lists. But I think I can satisfy you during our meet and confer.

Please lets do this on Monday with Mr. Carillo.

The Bostany Law Firm

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**From:** Robert Grand [mailto:rgrand@dreierllp.com]  
**Sent:** Friday, February 08, 2008 5:39 PM  
**To:** john@bozlaw.com  
**Cc:** Robert C. Carrillo; Jennifer Daddio; Mary Grieco; crystal.scott@bozlaw.com; Ira S. Sacks  
**Subject:** RE: GMA v. Eminent

John,

I just returned your call. I am free to discuss the issues regarding discovery anytime. Since we are only talking about our document request, I do not think that Mr. Carillo needs (or wants) to be on the call. With respect to yesterday's call with the Court, Judge Freeman stated quite clearly that your firm is supposed to

provide us with a list of documents that you have available for inspection in your office, warehouse or elsewhere, broken down by volume and category and/or the specific request that the documents are responsive to. We can do that by phone, but I think it makes more sense for you to provide that information to me in writing or via email. The only issue here that involves both cases is that if the responsive documents are the same in the Sanei case and in the Eminent case, then you should just produce to us one set of those documents. If you do not intend to produce the documents, but instead intend to make them available for inspection, we can send one person to inspect for both cases.

Again, I am available all day Monday to discuss.

Enjoy your weekend.

Best,  
Rob

**Robert J. Grand**  
Partner

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-----Original Message-----

**From:** John P. Bostany [mailto:john@bozlaw.com]  
**Sent:** Friday, February 08, 2008 5:08 PM  
**To:** Robert Grand  
**Cc:** 'Robert C. Carrillo'; Jennifer Daddio; Mary Grieco; crystal.scott@bozlaw.com  
**Subject:** RE: GMA v. Eminent

Mr. Grand

I rec'd a reply to my email below from Mary Grieco of your firm declining the suggestion to have a joint conference.

As such, when are you available to confer about your discovery concerns? I just called and was advised you were not available. I left a message.

Please let's set a date and time for us to confer pursuant to the Court's order.

Thanks

John

The Bostany Law Firm

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**From:** John P. Bostany [mailto:john@bozlaw.com]  
**Sent:** Thursday, February 07, 2008 6:36 PM  
**To:** 'Robert Grand'  
**Cc:** 'Robert C. Carrillo'; 'Jennifer Daddio'; 'Mary Grieco'; 'crystal.scott@bozlaw.com'  
**Subject:** GMA v. Eminent

Hi Mr. Grand

Although Judge Freeman advised that she did not have the authority to order the other attorneys from your firm that have requested a "meet and confer" on the Sanei case to be on our "meet and

confer", she encouraged you to do so. So the choice is yours. I am available to meet and confer either just on this case or on both cases together at your convenience.

I await your advices.

Letter enclosed.

John

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